

REMARKS/ARGUMENTS

Applicants would like to thank the Examiner for the careful consideration given the present application, and respectfully submit that the application is allowable in light of the remarks below.

Applicants note, with appreciation, the allowance of claims 3-7, 10, 16, 18 and 20 in response to applicants' previous amendment. Applicants also appreciate the identification of claim 2 as allowable if rewritten in independent form, however, applicants respectfully submit that the claims are allowable without amendment in light of the following remarks.

Claims 1, 11-13, 17 and 19 have been rejected under 35 U.S.C. §103(a) as being obvious in view of U.S. Patent No. 4,876,738 to Selby in view of U.S. Patent No. 6,009,497 to Wells et al. However, applicants respectfully submit that these references lack sufficient motivation therein to justify their combination, and therefore, claims 1, 11-13, 17 and 19 are allowable.

The teachings of the respective references teach away from their combination, thereby eliminating any suggestion or motivation to make the proposed modification. See M.P.E.P. §2143.01, citing *In re Gordon*, 733 F.2d 900, 221 U.S.P.Q. 1125 (Fed. Cir. 1984). Wells et al. is cited as teaching the nonvolatile storage medium according to claims 1, 11-13, 17 and 19, which, in combination with Selby, would have rendered the present invention obvious at the time of the invention. As described in Wells et al., the nonvolatile memory is a flash electrically-erasable programmable read only memory ("flash EEPROM") that has an array of memory areas for storing information. These memory areas retain information stored therein when power is removed, and are capable of being individually programmed within the array. However, as noted in Wells et al., a flash EEPROM is erased by applying a high voltage simultaneously to the source terminals of all of the memory areas (transistors) in the array. Each of the source

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terminals in the array are connected to one another, thereby preventing individual memory areas to be erased without causing the entire array to be erased at once. Thus, to rewrite changed, or updated data to a memory area already containing data, the entire flash EEPROM must be erased.

See col. 3, lines 31-50.

Selby discloses a mobile radio transmission system that regularly updates information stored in a plurality of memory areas of the mobile radio communication device. The memory areas of Selby are continuously updated to reflect movement of the mobile radio communication device to and from different service areas. An example of the information stored in these memory areas includes a location record and service area identities. As the location of the mobile radio communication device changes, the information stored in the memory areas is updated to remove or add information pertaining to the service areas least and most frequently visited, respectively. However, the memory areas are updated without disturbing the information to remain stored therein. Thus, individual pieces of information are added and removed as need and the amount of information that must be stored and updated is minimized. This would not be possible using the flash EEPROM of Wells et al. as the entire contents of that memory must be erased when it is desired to erase any piece of information in the array of memory areas. Modifying Selby according to the teachings of Wells et al. as suggested in the Office action would render the combination inoperable. Accordingly, applicants respectfully submit that claims 1, 11-13, 17 and 19 are patentable over the combination of Selby in view of Wells et al.

Claims 8, 9, 14 and 15 are allowable for reasons analogous to those above, and for further limitations therein.

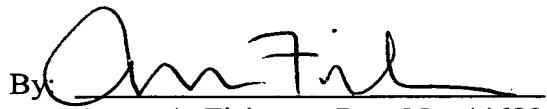
In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the

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application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 32857.

Respectfully submitted,  
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